

United States Courts
Southern District of Texas
FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS

APR 07 2025

HOUSTON DIVISION

Nathan Ochsner, Clerk of Court

BRYCE BROWN,

Plaintiff,

v.

CHANDRESH PATEL, ET AL.

Defendant,

G&A OUTSOURCING III LLC., DBA
ONPOINT LAB, ET AL.

Defendant.

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CIVIL ACTION NO. 4:24-cv-05036

JURY TRIAL DEMANDED

PLAINTIFF'S INITIAL DISCLOSURES

TO: Defendant, Chandresh Patel, ET AL. G & A Outsourcing III LLC., D/B/A OnPoint Lab, ET AL., by and through its attorney of record, G. Mark Jodon, Daniel Coolidge, 1301 McKinney Street, Suite 1900, Houston, Texas 77010

PLAINTIFF'S INITIAL DISCLOSURES

- The names, addresses (work and home), and telephone numbers (work and home) of individuals likely to have discoverable information that Plaintiff may use to support its claims or defenses are listed herein below:

1	Bryce_Brown Pro Se, Plaintiff, 935 N. Wilcrest Dr., Apt. 1018, Houston, Texas 77079 Phone: (281) 763-8151.
2	Carla Acosta, 145 Promenade Wy Ste 2, Sugar Land, TX 77479, (713) 614-4553, was Plaintiff's co-worker at OnPoint Lab, and is a witness to how Plaintiff sent emails, text messages and how plaintiff functioned, plaintiff Work ethics, personal distress caused by Plaintiff's lack of marketing materials.
3	Yorleni Moran, 145 Promenade Wy Ste 2, Sugar Land, TX 77479, (281) 650-3004, is a witness to Plaintiff's Work ethics, personal distress caused by Plaintiff's lack of marketing materials.

4	Chandresh Patel, 145 Promenade Wy Ste 2, Sugar Land, TX 77479, (713) 443-8523, was Plaintiff's former supervisor at OnPoint Lab; is a witness to how Plaintiff functioned at OnPoint Lab; is the cause to Plaintiff's pain and suffering, mental anguish, and personal distress caused to Plaintiff's discharge.
5	OnPoint Lab, and its Human Resources Manager Carla Acosta, it's employees, agents, and Records Custodian, 145 Promenade Wy Ste 2, Sugar Land, TX. 77479, 832-939-8480. G & A Outsourcing III LLC, its employees, agents, and Records Custodian, 17220 Katy Freeway, Suite 350 Houston, TX 77094, 713-804-8767, it's employees, agents and Records Custodian may have discoverable information regarding Plaintiff's claim the basis of this lawsuit.
6	The Equal Employment Opportunity Commission, and its EEOC Investigator, Gerard Lasers, its employees, agents, and Records Custodian, Mickey Leland Federal Building, 1919 Smith Street, 6th Floor, Houston, TX 77002, 346-327-7700.
7	The Equal Employment Opportunity Commission, and its EEOC Investigator, Gerard Ladera, its employees, agents, and Records Custodian, may have discoverable information regarding Plaintiff's claim the basis of this lawsuit.

**B. RELEVANT DOCUMENTS, ELECTRONICALLY STORED
INFORMATION & TANGIBLE THINGS**

2. The following is a list of all documents, electronically stored information, and tangible things, described by category and location, that Plaintiff has in his possession, custody, or control and may use to support its claims or defenses, available for inspection and copying with Plaintiff.

Notice of Right to Sue, charge number 460-2024-04187, issued October 04, 2024, Digitally Signed, Rayford O. Irvin, District Director.

Charge Of Discrimination, EEOC Form 5 (07/24), Agency Charge No. 460-2024-04187.

Text messages from phone number(s) (281)650-3004, (713) 614-4553, (713) 443-8523, (281)763-8151.

TWC Texas Workforce Commission, Unemployment Claims Analyst, Chance Sullins, (615)924-8604 HR logics/UCM.

Defendant Appeal Withdrawn, TWC Appeals Tribunal 3754863-1

Plaintiff Brown's Declaration and Exhibit(s), Civil Action No. 4:24-cv-05036.

Plaintiff Brown's Original Complaint and Exhibit(s), Civil Action No.4:24-cv-05036.

Plaintiff Brown's Motion for Summary Judgment.

C. INFORMATION RELATED TO CALCULATION OF DAMAGES

3. The information related to calculations of Bryce W. Brown's damages, includes loss wages, retirement benefits, health insurance benefits, vacation and sick pay, and other employment perks from December 18, 2023, to the present. Front pay to be determined later, and this amount will be provided via supplement, excluding pain and suffering, emotional distress damages, and punitive damages which will be determined by a jury. All nonprivileged documents that this computation is based on are available for inspection and copying at Plaintiff's attorney's office. This information is in no way complete, and should not be considered exhaustive. Plaintiff reserves the right to supplement this response in accordance with the Federal Rules of Civil Procedure.

D. INSURANCE

4. All insurance agreements required to be disclosed are described below: None. Plaintiff reserves the right to supplement these initial disclosures in accordance with the Federal Rules of Civil Procedure.

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'B. Brown', with a long horizontal line extending to the right.

Bryce Brown, Pro Se
935 N. Wilcrest Dr., Apt. 1018
Houston, Texas 77079
Phone: (281) 763-8151

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document has been mailed in the United States mail, postage prepaid, certified, return receipt requested, to all counsel of record on this 7th day of April 2025, addressed as follows:

Daniel Coolidge
G. Mark Jodon
LITTLER MENDELSON, P.C.
1301 McKinney Street, Suite 1900
Houston, TX 77010
713.652.4739 direct
713.951.9400 main
dcoolidge@littler.com

ATTORNEYS FOR DEFENDANT